

**To:** Grantham, Nancy[Grantham.Nancy@epa.gov]  
**From:** StClair, Christie  
**Sent:** Sat 3/12/2016 2:30:08 AM  
**Subject:** Re: OLEM/OSRTI/R8 ACTION - Daily Caller (DDL 5pm EST today): GKM

I'll send him 1, 2 and 3 - I couldn't track down any previous responses for 4.

Sent from my iPhone

On Mar 11, 2016, at 6:19 PM, Grantham, Nancy <[Grantham.Nancy@epa.gov](mailto:Grantham.Nancy@epa.gov)> wrote:

Seems that 1-2-3-4 have been used before - send him those and on Monday?

Sent from my iPhone

On Mar 11, 2016, at 6:08 PM, StClair, Christie <[StClair.Christie@epa.gov](mailto:StClair.Christie@epa.gov)> wrote:

First of two

Sent from my iPhone

Begin forwarded message:

**From:** "StClair, Christie" <[StClair.Christie@epa.gov](mailto:StClair.Christie@epa.gov)>  
**Date:** March 11, 2016 at 3:26:47 PM EST  
**To:** "Grantham, Nancy" <[Grantham.Nancy@epa.gov](mailto:Grantham.Nancy@epa.gov)>, "Cohen, Nancy" <[Cohen.Nancy@epa.gov](mailto:Cohen.Nancy@epa.gov)>, "Deitz, Randy" <[Deitz.Randy@epa.gov](mailto:Deitz.Randy@epa.gov)>, "Glikes, Michael" <[Glikes.Michael@epa.gov](mailto:Glikes.Michael@epa.gov)>, "Stalcup, Dana" <[Stalcup.Dana@epa.gov](mailto:Stalcup.Dana@epa.gov)>, "Mahmud, Shahid" <[Mahmud.Shahid@epa.gov](mailto:Mahmud.Shahid@epa.gov)>, R8 GKM Leadership Team <[R8\\_GKM\\_LeadershipTeam@epa.gov](mailto:R8_GKM_LeadershipTeam@epa.gov)>  
**Subject:** OLEM/OSRTI/R8 ACTION - Daily Caller (DDL 5pm EST today): GKM

Daily Caller is working on several stories regarding GKM. Below are their questions and draft answers. Responses needing OLEM/OSRTI/R8 input are marked.

Please respond no later than 5pm eastern.

Thanks!

Christie

**1. We would like to know if both breaching the mine and spilling mine waste was an accident. If it was, can you please point to any EPA statements where the agency called it an accident?**

**[From Administrator testimony – Anything I’ve missed?]** As Administrator McCarthy has said, “This was a tragic and unfortunate incident, and EPA has taken responsibility to ensure that it is cleaned up appropriately. While the Office of Inspector General’s investigation is ongoing, information the agency has received to date from both external and internal reviews of the matter has revealed no evidence that the blowout was in any way intentional.”

**2. Has anyone been punished or disciplined for the incident?**

**[From Administrator testimony – Anything I’ve missed?]** As Administrator McCarthy has said, “EPA and external entities will be thoroughly investigating the full facts regarding this incident and the response, and the agency will respond based on that information.”

**3. Why didn't the EPA consult with Fish and Wildlife Service before opening the mine if it would impact any endangered species or critical habitats, given that the EPA Internal Review noted that a blowout was likely?**

**[From the Addendum – OLEM/R8, anything to add?:]** The work goals for Aug. 4 and 5, 2015, were to assess the site conditions and to help prepare for a decision on future work, which would be discussed during a consultation meeting planned for August 14, 2015. [Should we add – “the work team was not attempting to open the mine.”?]

**4. Why was the Department of the Interior selected to conduct the Technical Evaluation, given its heavy involvement with both the project and the spill?**

•□□□□□ <http://www.epa.gov/goldkingmine/epa-announces-us-department-interior-lead->

**Need OLEM input.**

**5. Lastly, we would like to give the EPA the opportunity to comment on our findings:**

- a. Internal emails asserting that the Aug. 5 work was intended to relieve pressure suggest breaching the adit was likely not an accident;*
- b. The mine was never tested for pressure, even though the EPA knew it was at least somewhat pressurized. No explanation for this has been given so far; and*
- c. The EPA crew believed they were digging at the top of the adit due to erroneous determinations from work in 2014. It's mostly unknown how those determines were made. The crew, in fact, dug at the mine's entrance.*

**[From Addendum - OLEM - Anything to add?]** As stated in the Dec. 8, 2015 Addendum to the Agency's internal review, the Gold King Mine project manager identified preparatory and assessment work to be conducted at the GKM site. The preparatory and assessment work identified was: adit drainage control; water management system; excavation above adit/hill slope; and adit face excavation.

The Addendum notes that the work goals were to assess the site conditions and to help prepare for a decision on future work, which would be discussed during a consultation meeting planned for August 14, 2015. For example:

- ☐ The water management system would be needed if there was a decision to open the GKM site adit since there was potentially significant water buildup in the adit.
- ☐ The excavation above and at the face of the adit was needed to determine the exact location and condition of the blockage, and the exact

location of the bedrock above and around the adit.

In addition to providing the direction via e-mail, the project manager also provided clear verbal direction to [REDACTED], the EPA contractors, and DRMS staff not to proceed with any work on actually opening the adit prior to a planned consultation [with BLM] on August 14.

The Addendum then details the actions taken on Aug. 4 and Aug. 5, 2015:

[REDACTED] and the team (including [REDACTED] of DRMS and contractors) arrived at the site and began some excavation work on August 4. Under [REDACTED] direction, the team slowly and carefully scraped away loose soil and rubble near the face of the adit with the initial goal of locating the primary blockage. By the end of the day, the team had located the blockage, which they were able to identify as the blockage based on the tightness and condition of the material. They decided to wait until the following day, when [REDACTED] and [REDACTED] of DRMS would also join them, to continue additional excavation. On August 5, 2015 under the direction of [REDACTED], and with consultation from DRMS as well as contractor support, the team began additional excavation to identify the location of bedrock above and around the adit. Through this careful scraping and excavation, they were able to locate the bedrock. Prior to the final excavation and cleanup, the DRMS personnel left the site to proceed to other nearby mining sites. [REDACTED] continued to oversee the final cleanup work, which included clearing of the loose colluvium near the adit. Just prior to finishing, the team noticed a water spout a couple of feet high in the air near where they had been excavating above the top of the adit. Within a few minutes, the spout had turned into a large gush of yellow/orange water that ultimately resulted in a release of an estimated three million gallons.

**Christie St. Clair**

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